

LAGOMARSINO LAW

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AML@lagomarsinolaw.comcory@lagomarsinolaw.com*Attorneys for Plaintiff Sankona Graham***UNITED STATES DISTRICT COURT****DISTRICT OF NEVADA**

SANKONA GRAHAM;

Plaintiff,

vs.

THEODORE EISENLOFFEL; SAMUEL
MOUNCE; COUNTY OF NYE; SHARON A.
WEHRLY; DAVID BORUCHOWITZ;
RAYMOND HUNTLEY; KRISTEN
CLEVELAND; SERENITY HEALTH;
GABY CRUZ; JEFF M. RHODEN;
PATRICIA RHODEN; SAHRON BENES;

Defendants.

CASE NO.: 2:21-cv-01674-RFB-VCF

**STIPULATION AND ORDER TO
CONTINUE THE MOTION HEARING
SCHEDULED FOR JULY 25, 2023 (ECF
NO. 135)**

(FIRST REQUEST)

IT IS HEREBY STIPULATED AND AGREED between the parties and their undersigned attorneys to continue the Motion Hearing currently scheduled for July 25, 2023 (ECF No. 135). The current hearing is scheduled for July 25, 2023 at 1:00 p.m.. The parties respectfully request that the new hearing date be continued to a date in late September/early October at a date and time selected by the Court.

This Stipulation is supported by good cause, is the parties' first request, and not for the purpose of delay but rather because Plaintiff's counsel only recently appeared, *pro bono*, on June 15, 2023 (ECF No. 128) and currently has a twenty-five (25) day trial set in the Los Angeles Superior Court, starting on August 1, 2023, and a ten (10) day trial immediately following on September 12, 2023 in the U.S. District Court of Nevada. Furthermore, Plaintiffs' counsel has been or will be out of the jurisdiction during the summer (June 18 – July 4, 2023,

July 14-16, 2023, and August 30 – September 10, 2023). The totality of the Plaintiff's counsels' unavailability calls for a continuance to ensure that all the motions set for hearing are properly addressed. Furthermore, Plaintiff's counsel must acquaint themselves with the large file for the instant matter which has been in discovery for over a year.

DATED this 19th day of July, 2023.

LAGOMARSINO LAW

/s/ Cory M. Ford

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Attorneys for Plaintiff Sankona Graham

DATED this 19th day of July, 2023.

ERICKSON, THORPE & SWAINSTON, LTD.

/s/ Brent L. Ryman

BRENT L. RYMAN, ESQ. (#8648)
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*Attorney for Defendant Theodore Eisenloffel,
Samuel Mounce, County of Nye,
David Boruchowitz, and Sharon A. Wehrly*

DATED this 19th day of July, 2023.

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/s/ Brittany A. Lewis

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*Attorneys for Defendant Serenity Health,
Gaby Cruz, Jeff Rhoden, Patricia Rhoden*

IT IS SO ORDERED.

Dated this 20th day of July 2023.



Cam Ferenbach
United States Magistrate Judge

IT IS HEREBY ORDERED that the hearing SCHEDULED for July 25, 2023, is RESCHEDULED to 10:00 AM, September 26, 2023. Counsel must coordinate with Tawnee Renfro (Tawnee_Renfro@nvd.uscourts.gov) regarding Plaintiff's appearance by September 25, 2023. All else as stated in Order no. 129 remains unchanged.